



VIA OVERNIGHT DELIVERY

November 20, 2009

Andrew Taylor
Case Developer
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street, SFD-7-5
San Francisco, CA 94105

Re: Response to Request for Information Pursuant to Section 104 of CERCLA regarding Insurance Coverage relating to the Excello Plating Company Facility, 4057 Goodwin Avenue, Los Angeles, California ("Site")

Dear Mr. Taylor:

This response is provided to the U.S. Environmental Protection Agency's ("EPA") letter requesting information from The Hartford Financial Services Group, Inc., ("The Hartford") pursuant to Section 104(e) of CERCLA regarding insurance coverage for the entities identified in Enclosure B of the EPA's letter. By agreement reached with Ms. Rongone and Mr. Butler of the EPA, The Hartford received an extension of time to respond to the request through November 20, 2009.

While we recognize that The Hartford is not a responsible "person" within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") with regard to the Site, we wish to cooperate with the EPA's efforts relative to the Site and are voluntarily providing this response to assist the EPA's efforts to the extent possible without compromising any business privilege or confidentiality rights afforded to The Hartford by applicable law. As discussed with Mr. Butler, The Hartford is providing the EPA with copies of responsive insurance policies, related documents, and a related claim file in its possession. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Following the EPA's request, we have performed a reasonable investigation and attempted to locate and copy the responsive documents, which are contained on the enclosed CD. However, because of the requirements of Section 104(e), we believe we are also required to preserve objections and protect legal rights by submitting those objections in writing. Accordingly, given the accompanying production of documents, we also provide the following individual responses for the record. The Hartford does not intend by these responses to waive any applicable protection or right it has or may have in responding to these requests, including but not limited to the specific objections set forth below. In addition, the information and documents produced in response to this Information Request are submitted as "Company Confidential" and "Proprietary Business Information" pursuant to all applicable statutes and regulations.

As a general matter, The Hartford objects to the general scope of the Information Request. As noted specifically below (but not by way of limitation), The Hartford objects to the extent that the Information Request is overly broad, unduly burdensome, contains indefinite requests, seeks information not reasonably relevant to the above-referenced Site, and exceeds the EPA's statutory authority. Further, The Hartford objects to providing any information or documents protected by the attorney/client or work-product privileges. The Hartford reserves all of its rights, defenses and other legal protections afforded by applicable laws.

Additionally, The Hartford objects to the instructions and definitions included within the Information Request to the extent they purport to amend, change, or in any way modify or expand the scope of the controlling statutes pursuant to which this Information Request is issued. Further, The Hartford objects to the use of certain terms that are vague and not defined or which appear to add requirements that would not be applicable in other situations, such as discovery in court, and The Hartford does not adopt those definitions. The Hartford's response is in accordance with the generally accepted meanings of the terms utilized in framing the questions, without expansion or vagueness potentially created by the stated Definitions.

The Hartford incorporates by reference the objections and reservations of its rights stated above in its responses below. Without waiving its objections, The Hartford provides the following information:

Response to No. 1

Respondent: The Hartford Financial Services Group, Inc.
One Hartford Plaza
Hartford, CT 06155

Lawrence Farber
Assistant Vice President
Complex Claim Group
The Hartford
One Hartford Plaza T-7-92
Hartford, CT 06155
Telephone: (860) 547-7337

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Facsimile: (877) 905-0403
Email: lawrence.farber@thehartford.com

Please direct additional correspondence to:

Michael Petropoulos, Esq.
Complex Claim Group Legal
The Hartford
One Hartford Plaza, T-6-93
Hartford, CT 06155
Telephone: (860) 547-5450
Facsimile: (877) 538-9393
Email: michael.petropoulos@thehartford.com

Response to No. 2 – No. 4

After conducting a reasonable search, The Hartford identified insurance policies and related documents responsive to the request and is providing copies of these policies and documents, including but not limited to broker/agent correspondence, premium computation and reinsurance related information. In addition, The Hartford is providing copies of a claim made by Excello in 2002 relating to the site. Without waiving its general objections, The Hartford otherwise objects to this request as vague, overly broad, ambiguous and burdensome. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Response to No. 5

After conducting a reasonable search, The Hartford found no document or information that was responsive to this request. The Hartford otherwise objects to this request as vague, ambiguous, over broad and burdensome. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Response to No. 6 – No. 7

Without waiving its general objections, The Hartford objects to this request as vague, ambiguous, overbroad and burdensome. Without waiving its objections, please refer to Response 2. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

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Response to No. 8 – No. 9

Without waiving its general objections, The Hartford is providing copies of a claim made by Excello in 2002 relating to the Site. Please see Response 2. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

Response to No. 10 – No. 11

Without waiving its general objections, please refer to Response 2.

Response to No. 12 – No. 13

After conducting a reasonable search, The Hartford found no document or information that was responsive to this request. The Hartford otherwise objects to this request as vague, ambiguous, over broad and burdensome. The Hartford acknowledges that it is possible that some potentially relevant documents have not yet been identified, located, and/or reviewed. In this regard, we reserve the right to supplement or amend this response in the event additional information is identified that may be responsive to this request.

All of the responses set forth above are based upon The Hartford's reasonable investigation of its documents, and its current information, understanding and belief. The Hartford reserves its rights to conduct additional investigation with reference to any and all documents, facts, and evidence discovered after the date of these responses, notwithstanding the absence of the reference herein to such documents, facts or evidence at this time, and to supplement, amend or modify these responses as may be appropriate.

Please contact Michael Petropoulos if you have any questions about this response or if you should require any further information, and thank you again for the courtesy of the extension.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence Farber".


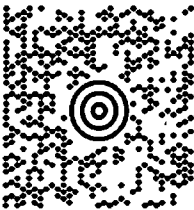


Lawrence Farber
Assistant Vice President
Complex Claim Group

CD Enclosed

LF:smh

UNSCANNABLE MEDIA

To use the unscannable media document # 2281612
contact the Region IX Superfund Records Center

<p>SUSAN HILLS 860-547-7111 THE HARTFORD 690 ASYLUM AVENUE HARTFORD CT 06115</p> <p>SHIP TO: ANDREW TAYLOR US EPA REGION 9 SFD-7-5 75 HAWTHORNE ST SAN FRANCISCO CA 94105</p>	<p>LTR 1 OF 1</p> <p>CA 941 9-22</p>  	<p>UPS NEXT DAY AIR SAVER 1P</p> <p>TRACKING #: 1Z 30V OE6 13 9037 4358</p>		<p>BILLING P/P</p> <p>Reference No 1: MA058201 Reference No 2: Excello Plating</p> <p>XDL 09 07 23 NV45 96 0A 10/2009</p>  <p>TM</p>
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